

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

IN RE: ZELIS REPRICING ANTITRUST LITIGATION	Lead Action Case No.: 1:25-cv-10734-BEM
This Document Relates To:	<i>Consolidated with Case Nos.:</i> <i>1:25-CV-11092-BEM</i> <i>1:25-CV-11167-BEM</i> <i>1:25-CV-11537-BEM</i>
All Associated Cases	

**STIPULATION TO EXTEND THE DEADLINES FOR RESPONSES AND REPLIES
TO DEFENDANTS' MOTIONS TO COMPEL ARBITRATION**

Plaintiffs Dr. Dennis C. Ayer, DDS, LLC, Pacific Inpatient Medical Group, Inc. (“PIMG”), Frank Scaccia, and Danny Bachoua Chiropractic, APC (“DBC”), and Defendants UnitedHealth Group, Inc., Aetna Inc., and Elevance Health, Inc., by and through their undersigned counsel, hereby stipulate as follows, subject to approval by the Court:

WHEREAS, on August 11, 2025, the above-named Defendants filed the following motions to compel arbitration:

- a. Defendant UnitedHealth Group, Inc., filed a motion to compel arbitration and memorandum in support of the same with respect to Plaintiffs Dr. Dennis C. Ayer, DDS, LLC, PIMG, and Frank Scaccia. (ECF Nos. 105-106).
- b. Defendant Aetna Inc., filed a motion to compel arbitration and memorandum in support of the same with respect to Plaintiff Dr. Dennis C. Ayer, DDS, LLC. (ECF Nos. 101-102).

- c. Defendant Elevance Health, Inc., filed a motion to compel arbitration and memorandum in support of the same with respect to Plaintiff DBC. (ECF Nos.108, 110).

WHEREAS, under D. Mass. L.R. 7.1(b)(2), Plaintiffs' respective responses to Defendants' motions to compel arbitration are due on August 25, 2025.

WHEREAS, the parties previously agreed to a briefing schedule for motions to dismiss that was approved by the Court and the parties desire to have the same briefing schedule apply to Defendants' motions to compel arbitration, specifically that the deadline for Plaintiffs to respond to the motions to compel arbitration would be September 22, 2025 and Defendants' reply briefs, if any, would be filed by October 20, 2025.

NOW, THEREFORE, the parties stipulate as follows:

1. That the deadlines for Plaintiffs to respond to Defendants' respective motions to compel arbitration are extended from August 25, 2025, to September 22, 2025.
2. That Defendants' reply briefs, if any, be filed by October 20, 2025.

IT IS SO STIPULATED.

Dated: August 20, 2025

/s/Maureen Forsyth

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Attorney for Defendant UnitedHealth Group, Inc.

CERTIFICATE OF SERVICE

I certify that on August 21, 2025, I caused a true and correct copy of the foregoing Notice of Voluntary Dismissal Without Prejudice, to be filed with the Clerk of Court using the CM/ECF system which will serve as notification of such filing to the email address of all counsel of record in this action.

/s/ Maureen Forsyth
Maureen Forsyth